



Larson Tool & Stamping Company

90 Olive Street P.O. Box 2970 Attleboro, MA 02703-0970 Tel: 508-222-0897 Fax: 508-226-7407
eMail: stampings@larsontool.com Web: www.larsontool.com

Progressive
Stamping

Tool Design
(CAD)

Tool Making

Forming

Deep Drawing

Swaging

Welding

Blanking

Fastener
Installation

November 13, 2001

Gloria Blue
Executive Secretary
FR0001@wstr.gov
TPSC, Office of the USTR
600 17th Street, NW
Washington, DC 20508

Gloria Blue

Larson Tool and Stamping Company, Inc. requests a product exclusion from the International Trade Commission recommended import remedies.

This product exclusion request would be for Ds Type B (DS-B), DDQAK, Fire Extinguisher Grade, C1008 Modified ASTM A-620.

As further defined, this material Cold Roll Steel with a Light Matte surface. The chemical composition must be held to .04 to .08 carbon, DDQAK. The thickness of the material range is .030 to .115 inches.

Over the past three decades that we have been manufacturing fire extinguishers, we have only been able to procure our raw material successfully from two sources. Over the last fifteen years we have try to develop sources throughout all of the United States and Canada and have only been able to develop one, that being United States Steel in Fairless, PA. Many of the other United States Mills that we have tried to develop have finally given up on us simply because they realize that they are not capable of duplicating the quality of the product from France, even after having been given samples of the French material to analysis both physically and chemically. Our French source is Usimor Steel Corporation, Sollac – Biache. Our source in France makes a superior quality product to that of our source in the United States. We have less down time and rejections with the imported material and fewer tool related issues. In an environment where cost reduction and quality improvement are always being expected, the United States Mills are a negative influence to our customer's specifications and expectations. A positive response to this proposal would allow us, and our customer, to continue to be competitive in the worldwide market place.





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An attached Excel file will outline the consumption of material that we request to be excluded. The data will cover the years 1996 through 2000, with projections based on sales and usage history, from both our customer, and ourselves for the years 2001 through 2005.

We therefore ask your honorable body to grant our request to exclude our raw material from import remedies.

Sincerely

Daniel G. Larson
President

